

**Before the
Federal Communications Commission
Washington, DC 20554**

In the matter of:

**Amendment of Part 97 of the Commission's
Amateur Service Rules Governing
Operating Privileges**

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RM-10413

Comments from Mark Spatny, KD6JLS

As a member of the ARRL, and one of the Tech Plus licensees who will be most affected by this measure, I would like to say that in general, I support the concept of re-farming of the Novice sub-bands. HOWEVER, I strongly feel that this particular proposal from the ARRL is not the correct way to do it. The proposal is written simply to cater to the immediate interests of radio hobbyists. It does not address the long-term needs of the amateur radio service, nor does it consider the reasons the segments are currently underutilized. Most importantly, it does not address the issue of new technologies, which I believe to be critical at this time. Therefore, certain modifications should be made to the plan suggested by the ARRL.

The FCC should reallocate the Novice bands only for low power digital data and voice transmissions, and experimental modes.

In its summary of the re-farming proposal, the ARRL states: “*ARRL believes that conversion to digital communications technologies in the Amateur Service is a critically important component of the future of Amateur HF communications. This conversion will be necessary in order to accommodate growth in the service and extension of Amateur leadership in the development and refinement of digital communications technology.*” However, the ARRL’s proposal does nothing to encourage the conversion to these technologies. It simply grants more radio spectrum to people using legacy modes. The FCC should reject this patronage for legacy operators, and give spectrum to amateurs interested in advancing the radio art.

It would encourage more amateurs to be involved with, and develop, new digital technologies, and enlarge the pool of skilled technicians who can serve the future needs of the communications industry. Giving Morse code and SSB voice operators additional spectrum does neither of these things.

Furthermore, the ARRL proposal would grant Novice and Tech Plus licensees CW privileges on all General allocations, but data privileges only on the 10m band. This does not go far enough. The FCC should grant Novice and Tech Plus licensees operating privileges for ALL DATA MODES in all the band segments now authorized for General Class operators, along with CW.

Granting greater HF digital privileges on these frequencies to entry level amateurs serves the amateur service, as well as the country as a whole, in the following ways:

1) If digital modes are the future of amateur radio, and communications in general, then we should encourage such operation with new licensees who will learn their life-long operating habits when they first enter the hobby.

2) It would give an opportunity for all license classes to participate, in a meaningful way, with HF emergency traffic. Experience has shown that narrow band digital modes such as PSK31 can be as efficient and reliable as Morse signals. If Novice and Tech Plus operators could operate digital modes on all the same bands as Generals, they wouldn't need high speed Morse skills, or voice privileges, to provide this important service to our country in time of war and disaster. Any licensed amateur capable of operating a keyboard could pass HF emergency traffic. Furthermore, using experimental digital modes, operators would be able to handle more than the basic health and safety messages deliverable through Morse and voice communications. They would be able to transmit images and other data which would be much more useful to the emergency organizations served. Limiting Novice and Tech Plus operators to 10m for digital modes limits our ability to help in emergencies.

3) It would continue the original purpose of the Novice sub-bands, which was to encourage new operators in the amateur radio service. Young people are naturally drawn to technology, which is why the number of amateur operators is in decline. Although Morse users would have you believe otherwise, the youth of America are rightfully more interested in computers and cell phones than Morse code. Morse code is not relevant in the 21st century. Having a special band for novice operators to practice their code skill is not an incentive to join the service or advance their skills. Rather, it seems more like a fraternity hazing ritual, which must be overcome merely because of tradition. On the other hand, give kids a chance to combine computers with radios to communicate with people around the world, and they will gladly join the ranks of amateur radio operators in a meaningful and productive way.

Thank you for considering these alternatives.